

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

LINDA BUTCHER, et. al.,  
Defendants.

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CIVIL ACTION NO. 2:16-cv-126-JRG

JURY TRIAL DEMANDED

**DEFENDANT’S MOTION FOR AN  
EXTENSION OF TIME TO ANSWER, PLEAD OR OTHERWISE RESPOND**

Defendant Virtual Investments, LLC, (“Defendant”) without waiving any defenses or any matters that might be presented pursuant to Federal Rule of Civil Procedure 12(b) or any other rule or law, file this motion for extension of time in which to answer, move, or otherwise respond to the Amended Complaint of Plaintiff Associated Recovery, LLC (“Plaintiff”) and would respectfully show the Court as follows:

Counsel for Defendant was only recently retained by Defendant. Defendant’s counsel attempted to reach Plaintiff’s counsel, by telephone and electronic mail, to request a 30 day extension. Plaintiff has granted a 30 day extension to other defendants in this case, and thus, Defendant anticipates that Plaintiff will not be opposed to the requested extension. Nonetheless, because Plaintiff has not expressly agree to an extension, Defendant files this motion requesting that it be granted a 30 day extension to respond in any manner whatsoever including answer, motion or other pleading of any type to Plaintiff’s Amended Complaint up to and including August 10, 2016.

Dated: July 9, 2016

Respectfully submitted,

/s/ Hilda C. Galvan

Hilda C. Galvan

Lead Attorney

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JONES DAY

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), counsel for Defendant attempted to reach counsel for Plaintiff to discuss its request for a 30 day extension. Although Plaintiff has granted a 30 day extension to a number of defendants, Defendant was not able to reach Plaintiff and thus, must indicate that this motion is opposed.

/s/ Hilda C. Galvan

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(d) on July 9, 2016.

/s/ Hilda C. Galvan